



May 16, 2024

Hon. Andrew L. Carter Jr.
United States District Judge
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Hon. Ona T. Wang
United States Magistrate Judge
500 Pearl St.
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#: _____
DATE FILED: May 16, 2024

Re: *New York Legal Assistance Group v. Social Security Administration*, No. 23 Civ. 9363

Dear Judges Carter and Wang,

We write jointly on behalf of Plaintiff New York Legal Assistance Group and Defendant Social Security Administration to clarify the effect of Judge Wang's Order, ECF No. 32, issued after the conference held yesterday. That Order terminated the ECF motion event for Defendant's motion for a pre-motion conference regarding an anticipated motion to dismiss certain of Plaintiff's claims, ECF No. 31.

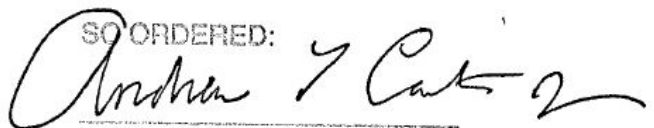
The Parties understand that, in lieu of either Judge Carter or Judge Wang holding a pre-motion conference specifically about Defendant's proposed motion, the Parties are directed to confer regarding a briefing schedule and scope for the motion, and report the results of that conferral process (as well as other issues) to Judge Wang in the status letter due to her on June 21, 2024. Accordingly, we understand that Plaintiff's deadline to respond to the pre-motion letter, which would have been tomorrow, May 17, 2024, is adjourned *sine die*, with no prejudice to Plaintiff's right, in the June 21, 2024 status letter or at another time, to articulate any opposition to holding a pre-motion conference on Defendant's anticipated motion to dismiss. We write to ensure that the parties, Judge Wang, and Judge Carter share this understanding.

In the alternative, Plaintiff respectfully requests a one-week extension of time to respond to Defendant's letter, that is, until Friday, May 24, 2024. Defendant consents to this request.

Thank you for your consideration.

Respectfully submitted,

/s/ Jessica Ranucci
Jessica Ranucci
Danielle Tarantolo
Counsel for Plaintiff

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

May 16, 2024
New York